IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA, Plaintiff, v. LI SHAOMING, MO HAILONG, also known as Robert Mo, WANG LEI, WANG HONGWEI, YE JIAN, LIN YONG, and MO YUN Defendants.	))))))))))))	Case No. 4:13-CR-147 DEFENDANT MO HAILONG'S MOTION FOR LEAVE TO FILE UNDER SEAL (UNRESISTED)

Defendant Mo Hailong requests this Court's leave to file his motion to continue travel under seal. In support of his motion, Mr. Hailong states as follows:

1. The undersigned counsel propose to file under seal a motion requesting Mr. Hailong be allowed to continue his travel to Houston, Texas for confidential medical reasons.

2. Due to extensive media interest in this case, including attempts to film the Defendant, the parties wish to keep the details of his continued travel and medical treatment confidential.

3. The government is in agreement with the motion to continue travel to Texas being filed under seal.

WHEREFORE, Defendant Mo Hailong prays this Court for an order granting his motion for leave to file under seal his motion to continue travel to Texas.

WEINHARDT & LOGAN, P.C.

By ______________________________
Mark E. Weinhardt AT0008280
Holly M. Logan AT0004710

2600 Grand Avenue, Suite 450
Des Moines, IA 50312
Telephone: (515) 244-3100
E-mail: mweinhardt@weinhardtlogan.com
hlogan@weinhardtlogan.com

LAW OFFICE OF MARK BECK

By ______________________________
Mark Beck (Admitted pro hac vice)

350 West Colorado Blvd, Suite 200
Pasadena, CA 91105
Telephone: (626) 234-5334
Email: mbeck@markbecklaw.com

ATTORNEYS FOR MO HAILONG, ALSO KNOWN AS ROBERT MO

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon the parties to this action by serving a copy upon each of the attorneys listed below on 12/22, 2014, by

- ☐ U.S. Mail
- ☐ FAX
- ☐ Hand Delivered
- ☐ Electronic Mail
- ☐ FedEx/ Overnight Carrier
- ☒ CM / ECF

Jason T. Griess
U.S. Attorney's Office
jason.griess2@usdoj.gov

Marc Krickbaum
marc.krickbaum@usdoj.gov

Leon F. Spies
Mellon & Spies
Spieslegal@aol.com

Terry W. Bird
Bird Marella
TWB@birdmarella.com

ATTORNEYS FOR MO YUN

Signature: M. Baldus